

Ackerman, Joyce

From: Ackerman, Joyce
Sent: Wednesday, October 25, 2017 4:59 PM
To: Stovall - CDPHE, Curtis; Walker - CDPHE, David; martin.ogradey@state.co.us; Fronczak, David
Subject: Neuhauser: Phase 2 report commens
Attachments: Phase 2 Report - Final as submitted to CDPHE - 20171020.pdf

Hi all – I skimmed through the Phase 2 report (I attached the body of the report; the appendices are in the dropbox website).

I don't agree with some of the statements in Sections 3 and 4. Table 3.1 appears to have errors – it is not necessary to have the 20:1 dilution factor when you don't have a solid matrix – you don't conduct the TCLP leaching procedure on a liquid sample, you just analyze the liquid matrix and compare the results to 40 CFR 261.24. I also think using the IBM 1981 Generator information is insufficient – we now have the IBM 104(e) information which is more complete. In addition, I don't know if IBM was the only customer of Neuhauser (I'm not including Sundstrand here since their waste was apparently burned). However the PA mentions an Air Force Base in Cheyenne, WY, plus the nearby communities who sent solid waste.

Also, the discussion states that "some" drums contain liquids which are considered hazardous, which implies some drums contain liquids that are not considered hazardous. I'm not sure what it's referring to as non-hazardous – perhaps the toluene which was 760,000 ppm in one sample, so almost pure toluene. Regardless, in the CERCLA Program, we look at whether a waste is a CERCLA "hazardous substance." RCRA hazardous wastes are included in the list of CERCLA hazardous substances, but there are many more. I am uncomfortable with the conclusion that there are wastes in drums that are not "hazardous."

I don't think sampling data from two drums is going to be enough to characterize the drums for purposes of disposal. This will need to be a discussion with Stewart and the waste broker they propose to use, i.e., how much characterization does the waste broker and incinerator need to accept the drums?

The report seems like it concludes that this one investigation and the EM-survey is sufficient to characterize the entire site with respect to buried drums. I don't know enough about geophysics, but I question whether this is adequate for a site of this size and the quantities reported to have been disposed here. My question is, if IBM sent upwards of 1500 drums to the site, where are they? Suppose only 100 drums and/or carcasses are found in the November removal action, where are the rest? As I have said before, this is an interim action intended to address the drums found in this investigation. The EPA Removal Program is not certifying that this is the only investigation needed at the site and that all buried drums have been found. I think the PRP should not try to present this to the Town and public as a comprehensive investigation of the Site. I don't know if they will try to present this conclusion, but I think we should be alert to this possibility.

I don't know if you have the opportunity to comment on the report, but I think it has some errors and some conclusions that either aren't clear or go too far.

Just a few thoughts. Thanks!

Joyce

Joyce Ackerman
On-Scene Coordinator and START P.O.

U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202
(303) 312-6822